

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA

v.

ALISHA FEENEY

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No. 4-15-CR-151-O (10)

**DEFENDANT’S MOTION TO EXTEND DEADLINE TO FILE OBJECTIONS TO THE
PRESENTENCE REPORT**

Defendant, Alisha Feeney, by and through his undersigned counsel, hereby moves to extend the deadline to file objections to the presentence report by seven days. In support thereof, he would respectfully show the court the following:

- 1) The case is presently set for sentencing for on November 16, 2015; written objections to the presentence report are due by September 24, 2015.
- 2) Counsel was set for a trial in the 396TH District Court of Tarrant County on September 21, 2015. That case has been moved to October 13, 2015. Counsel has reviewed the presentence report, but Counsel needs the extra time to research, investigate, confer with client, and prepare his objections to the presentence report as counsel has been preparing a State case for trial.
- 3) The government is not opposed to this motion.
- 4) This motion is made in the interest of justice and not for purposes of delay.

For the foregoing reasons, Feeney prays that the Court extend the deadline to file objections to the presentence report by seven days.

Respectfully Submitted,

/s/ George Dewayne Huston
George Dewayne Huston
The Huston Firm, P.C.
100 East 15th Street, Suite 620
Fort Worth, TX 76102
817-924-2222 (t)
817.924-2221 (f)
dewayne@thehustonfirm.com
TX Bar No. 24029623

CERTIFICATE OF CONFERENCE

I, GEORGE DEWAYNE HUSTON, hereby certify that on September 22, 2015, I conferred with Assistant United States Attorney Shawn Smith, counsel for the government. I have been advised that Shawn Smith is UNOPPOSED to the motion.

CERTIFICATE OF SERVICE

I, GEORGE DEWAYNE HUSTON, hereby certify that on September 23, 2015, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic filing system for the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2)

/s/George Dewayne Huston
George Dewayne Huston
The Huston Firm, P.C.
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